

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOSEPH SPADAFORA and GUDELIA LEVINE, Civil No.: 19-cv-6631 (GW)

Plaintiff,

-against-

THE STANDARD FIRE INSURANCE
COMPANY,

Defendant.

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PLAINTIFFS' NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and exhibits appended thereto, and upon all prior proceedings, pleadings and filings in this action, plaintiffs will move before this Court at the United States Courthouse for the Southern District of New York, before the Honorable Gregory Woods, United States District Judge, for an Order *in limine* prohibiting Nicholas Rago from providing any testimony of an expert nature at trial, including the amount of and basis for his damage estimate, that he is prohibited from making any reference at trial whatsoever to conversations with Doug Dodge, to replace Trial Exhibits 13 and 14, and all other relief that is just and proper.

Dated: New York, New York
April 30, 2021

LAW OFFICES OF
ERIC DINNOCENZO

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